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6 Attorneys for Defendant  
MARIELA PANGANIBAN  
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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) Case No. 2:21-CR-32-MCE-1  
11 )  
Plaintiff, ) **STIPULATION AND ORDER TO CONTINUE**  
12 ) **STATUS ON SENTENCING**  
vs. )  
13 ) Date: July 22, 2021  
MARIELA PANGANIBAN, ) Time: 10:00 A.M.  
14 ) Judge: Hon. Morrison C. England, Jr.  
Defendant. )  
15 \_\_\_\_\_)

16 IT IS HEREBY STIPULATED and agreed by and between Acting United States  
17 Attorney Phillip A. Talbert, through Assistant United States Attorney Matthew Thuesen, counsel  
18 for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender  
19 Christina Sinha, counsel for Ms. Mariela Panganiban, that the status regarding sentencing,  
20 currently set for July 22, 2021, may be continued to **September 9, 2021 at 10:00 A.M.**

21 The parties specifically stipulate as follows:

- 22 1. By previous order, this matter was set for a status regarding sentencing on July  
23 22, 2021. ECF No. 16.
- 24 2. By stipulation, the defense now moves to continue the status conference to  
25 September 9, 2021.
- 26 3. Undersigned defense counsel has been newly assigned this case. As such, she  
27 requires time to review the discovery in this matter and otherwise prepare for  
28

1 sentencing.

- 2 4. Defense counsel believes that failure to grant the requested continuance would  
3 deny her the reasonable time necessary for effective preparation, taking into  
4 account the exercise of due diligence.
- 5 5. The government does not object to the continuance.
- 6 6. As this matter is post-plea, there are no Speedy Trial Act considerations.
- 7 7. Therefore, the parties respectfully request the Court to set this matter for a status  
8 regarding sentencing on September 9, 2021 at 10:00 A.M.

9  
10 Respectfully submitted,

11 HEATHER E. WILLIAMS  
Federal Defender

12 Date: July 19, 2021

/s/ Christina Sinha  
CHRISTINA SINHA  
Assistant Federal Defender  
Attorneys for Defendant  
MARIELA PANGANIBAN

16 Date: July 19, 2021

17 PHILLIP A. TALBERT  
Acting United States Attorney

18 /s/ Matthew Thuesen  
Matthew Thuesen  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: July 19, 2021



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MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE